

MAY 24 1993

Before the
Federal Communications Commission
Washington, DC 20054

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

replacement of Part 90
by Part 88 to Revise
the Private Land Mobile
Radio Services and Modify
the Policies Governing them

PR Docket 92-235

To: The Commission

MAY 24 1993
FCC-FINL RC

COMMENT ON

Inland Steel Company submits its comments in response to the Commission's Notice Of Proposed Rule Making in this proceeding.

Inland Steel Company is the fifth largest manufacturer of steel in the United States. The company's steelmaking operations are situated on approximately four square miles of land located in East Chicago, Indiana. Inland Steel Company currently utilizes approximately 3,300 pieces of radio equipment for voice communication, data communication, and control communication for cranes and locomotives. Radio communication plays an important role in the production of steel at Inland Steel Company.

If the above referenced Notice Of Proposed Rule Making (NPRM) is implemented, Inland Steel Company will be impacted both from an operational and financial standpoint. First, technology utilizing bandwidths of 5 kHz and 6.25 kHz is not yet proven and probably will not be available by January 1, 1994. Therefore, we will most likely be unable to install any new radio equipment until the appropriate technology is available. Secondly, we feel that the NPRM is too ambitious in its schedule. As the schedule is currently written, we feel that we will not have ample time to study our current usage of radio equipment and develop a gradual plan for transition of technology that meets both FCC regulations and Inland Steel Company's financial constraints and operational needs. Inland Steel Company has invested a substantial amount of money in radio equipment and would have to spend millions of dollars more in a rather short time to be in full compliance with the NPRM.

Inland Steel Company understands that the Land Mobile Communications Council (LMCC) has prepared a "Consensus Plan" and substantially agrees with that plan with the following exception and commentary. Furthermore, Inland Steel Company supports Option A of the VHF channel plan.

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One exception Inland Steel Company has is with the proposal to designate frequencies currently designated as "offsets" to primary frequencies effective January 1, 1994. This proposal is contained under the section entitled "Migration Plan to Increase Capacity." Inland Steel Company currently makes extensive use of offset frequencies along with many other users in our geographic vicinity. If this portion of the LMCC plan is implemented, interference could become a serious problem on this group of frequencies. We understand that the LMCC has put forth an option regarding obtaining exclusive use of offset frequencies. Given the amount of usage of offset frequencies by Inland Steel Company and other licensees in the area, this plan may not provide users with the number of channels they would like exclusive use of. Also, if another licensee obtains exclusive use of a channel on which we are a secondary user, we might run a greater risk of experiencing interference problems. We feel that this issue needs to be addressed in more detail.

One comment Inland Steel Company would like to make is in regard to proposed power limits. We understand the FCC's concern that applicants are occasionally licensed for more power than necessary to obtain necessary coverage. However, the power limits proposed in the NPRM could place undue financial burden on Inland Steel Company and other licensees with unusual coverage requirements. The size and physical makeup of our facility necessitate greater power in order for a signal to penetrate buildings and equipment in our plant. For this reason, we concur with the "safe harbor" tables proposed by the LMCC only as long as there are reasonable methods to deviate from the tables for specific coverage needs.

We also agree that the frequency coordinators be given the authority to recommend power limitations. Placing this authority in the hands of the coordinators eliminates the need for rule waivers which would negatively impact the FCC's processing time.

Respectfully submitted,
Inland Steel Company
5/21/93

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